

FILE

BEFORE THE PUBLIC UTILITIES COMMISSION 2011 DEC -9 P 3:12

OF THE STATE OF HAWAII

PUBLIC UTILITIES
COMMISSION

In the Matter of the Application of) Docket 2011-0112
)
HAWAIIAN ELECTRIC COMPANY, INC.)
)
For Approval to Recover Deferred Costs)
for Big Wind Implementation Studies)
through the Renewable Energy)
<u>Infrastructure Program Surcharge.</u>)

LIFE OF THE LAND'S

STATEMENT OF POSITION.

&

CERTIFICATE OF SERVICE

HENRY Q CURTIS
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LIFE OF THE LAND

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Aloha Commissioners,

Life of the Land ("LOL") respectfully submits the following Statement of Position, pursuant to the Order Approving Proposed Stipulated Procedural Order, As Modified, dated August 31, 2011.

This docket serves as a prudence review for questions raised by the Commission in Docket 2009-0162. On December 11, 2010 the Commission issued its Decision and Order in Docket 2009-0162 closing that docket:

"the commission will allow HECO to defer costs for the Big Wind Implementation Studies for later review for prudence and reasonableness. [] In its subsequent prudence review, HECO should provide the commission with comparable evaluation of other options to that which it conducts for Big Wind, be it through the Studies or other means. Such alternatives could include residential PV, large-scale PV, biomass, biofuel and concentrated solar options. Alternatives could also include renewable energy project proposals that HECO rejected in the past two years due to completion dates and transmission concerns.

In addition, as part of any prudence review, the commission expects that the Studies would enable the commission to answer the following questions:

1) What is the total cost of Big Wind (including the costs of the undersea cable, Oahu transmission and distribution upgrades, purchased power, and changes in the generation fleet to support Big Wind);

2) Are there viable alternatives to Big Wind for meeting the State's Renewable Portfolio Standards, HRS § 269-92; and

3) What are the costs of all alternatives to Big Wind (including any projects that arose through competitive bidding, grandfathered projects, recently declined PPA requests, concentrated solar, distributed solar PV, large-scale solar PV, biofuel and biomass projects)."

Life of the Land believes that HECO has failed to justify ratepayer recovery for any of the Big Wind studies. HECO was required to meaningfully look at alternatives. They failed to do so. HECO was required to examine comparative costs. They failed to do so.

The record speaks for itself. There is nothing more that needs to be added to the record.

Rebuttal testimony is inappropriate.

Rebuttal testimony must be precisely directed to rebutting testimony or evidence presented by an **adversarial party**. Rehashing previously submitted testimony is improper and a waste of the Commission's precious time and resources.

Adversarial parties -- County of Maui and Life of the Land -- rely on the existing HECO record and have not offered additional adversarial testimony

or evidence. The Consumer Advocate traditionally does not oppose the request. Therefore there is nothing to rebut.

Life of the Land supports going directly to Opening Briefs.

DATED: Honolulu, Hawai`i, December 9, 2011.

A handwritten signature in cursive script, reading "Henry Q. Curtis", is written over a horizontal line.

HENRY Q CURTIS

VICE PRESIDENT FOR CONSUMER ISSUES

CERTIFICATE OF SERVICE

The foregoing STATEMENT OF POSITION was filed by hand delivered to the Public Utilities Commission, the Consumer Advocate and to HECO (Dean Matsuura).
Electronic copies were sent to all parties listed below.

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Dated: December 9, 2011, Honolulu, HI


HENRY Q CURTIS
VICE PRESIDENT FOR CONSUMER ISSUES